

COUNT 2

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The First Assistant United States Attorney further charges:

2. On or about November 5, 2019, in the Northern District of Ohio, Defendant ORIN FRANCE, in connection with the acquisition of firearms, namely four (4) Glock pistols: two (2) model 17s, serial #BLKT232 and serial #BLKT369; one (1) model G48, serial #BKND103; and one (1) model 19, serial #BHHK441, from Parma Armory, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly and with the intent to deceive Parma Armory made a false and fictitious written statement to Parma Armory as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that Defendant ORIN FRANCE did execute a Department of Justice, Bureau Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearm indicated on the Form 4473, which was untrue and likely to deceive Parma Armory, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The First Assistant United States Attorney further charges:

3. On or about November 8, 2019, in the Northern District of Ohio, Defendant ORIN FRANCE, in connection with the acquisition of firearms, namely four (4) Glock pistols: two (2) model 17s, serial #BMKX272 and serial #BMKX273; and two (2) model 19s, serial #BMFU566 and serial #BMFU567, from Gun Enthusiast of Ohio doing business as Cleveland Armory (Ohio) ("GEO"), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly and with the intent to deceive GEO, made a false and

fictitious written statement to GEO as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that Defendant ORIN FRANCE did execute a Department of Justice, Bureau Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearm indicated on the Form 4473, which was untrue and likely to deceive GEO, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

MICHELLE M. BAEPLER
First Assistant United States Attorney

By:

A handwritten signature in black ink, appearing to read "D.J. Riedl", written over a horizontal line.

Daniel J. Riedl, Chief
National Security Unit